

# Whitt Law Firm, LLC

ATTORNEYS AND COUNSELORS AT LAW

ADMITTED TO THE UNITED STATES  
SUPREME COURT BAR (1996)

"A VETERAN OWNED LAW FIRM"

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April 22, 2021

**VIA, ELECTRONIC MAIL & VIA ELECTRONIC FILING**

The Honorable Jocelyn G. Boyd  
Chief Clerk/Executive Director  
Public Service Commission of South Carolina

- Re:   • South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource Plans for Duke Energy Carolinas, LLC and Duke Energy Progress, LLC;  
     • Dockets 2019-224-E and 2019-225-E  
     • **Revised Direct Testimony of Kevin Lucas, E-filed April 21, 2021**  
     • **Request for Removal of Filing**

Ms. Boyd:

The undersigned is counsel of record for the Carolinas Clean Energy Business Association ("CCEBA"), in the two above-referenced Dockets.

Please reference the Public Direct Testimony of Kevin Lucas, e-filed with the Commission on April 21, 2021, and marked as "Revised". DEC/DEP's counsel instructed us to refile Kevin Lucas' Direct Testimony, because DEC/DEP was removing some redacted material. Our instructions from DEC/DEP's counsel read as follows, "Duke has closely reviewed Lucas's (*sic*) direct testimony and highlighted (and designated with Begin/End Confidential markers) all of the information and graphs that need to be redacted.", (a copy of email instructions attached for your ready reference). In compliance with DEC/DEP's instructions, 100% of the information that was "designated with Begin/End Confidential markers" was redacted from the public version of the Testimony that was e-filed with the Commission yesterday. DEC/DEP's counsel has informed us that DEC/DEP additionally wanted highlighted information without the "designated with Begin/End Confidential markers", to be redacted.

**Accordingly, we request that the e-filed public version of the "Direct Testimony of Kevin Lucas, Revised April 21, 2021, be removed from the Commission's electronic Docket, as soon as is practicable.**

We will then refile the revised Direct Testimony of Kevin Lucas with the additional redaction of testimony that was “highlighted”, but which did not contain the designation of “Begin/End Confidential markers”.

Please advise if any additional information is needed, and this request is,

Respectfully Submitted,

/s/Richard L. Whitt

Richard L. Whitt,

*As Counsel for Carolinas Clean Energy  
Business Association.*

RLW/cas

cc: All parties of record in Dockets 2019-224-E and 2019-225-E, *via electronic mail*